



**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

**VOTER REFERENCE FOUNDATION, LLC**

Plaintiffs,

**v.**

**RAUL TORREZ**, in his official capacity as New Mexico Attorney General, and **MAGGIE TOULOUSE OLIVER**, in her Official capacity as New Mexico Secretary of State,

Defendants.

**CASE NO: 1:22-cv-00222-JB-KK**

**NOTICE OF DEPOSITION OF DEFENDANT TORREZ UNDER FED. R. CIV. P. 30(B)(6)**

PLEASE TAKE NOTICE that the deposition of Defendant Raul Torrez, pursuant to Fed. R. Civ. P. 30(b)(6) and through one or more officers, directors, or other representatives who shall be designated to testify on Defendant Torrez' behalf regarding all information known or reasonably available to his office with respect to the subject matters identified in Attachment A, will be taken by Graves Garrett LLC, counsel for Plaintiff, at the offices of Harrison, Hart & Davis, LLC, 924 Park Avenue SW, Suite E, Albuquerque, NM, commencing at 9:00 a.m. on February 27, 2023, and continuing until completed, before a person authorized by law to administer oaths and recorded by stenographic means.

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*Counsel for Plaintiff VRF*

**CERTIFICATE OF SERVICE**

I, Edward D. Greim, certify that on January 25, 2023, this Notice of Deposition was served via e-mail as follows:

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/s/ Edward D. Greim  
Edward D. Greim  
Counsel for Plaintiff

## **EXHIBIT A**

1. The existence and duration of any criminal investigation of VRF.
2. Any contacts between the agents of the Attorney General and any third parties with respect to the criminal investigation, including but not limited to contacts with the FBI and other Attorneys General or state officials.
3. The extent to which the Attorney General or his agents played any part in the decision of the Secretary of State to refuse VRF's requests for voter data from 2022 to the present.
4. The basis for the Attorney General's assertion that VRF, or anyone acting in concert with it, violated New Mexico law or may have violated New Mexico law.
5. The basis for the Attorney General's assertion, including but not limited to the assertion in the response to Request for Admission 5, that sharing of data "alone" does not violate New Mexico law.
6. The basis for the Attorney General's assertion, including but not limited to the assertion in the response to Request for Admission 8, that the act of "publishing [voter data] online" may not violate New Mexico law if "publishing online" is for a "permissible use." This includes the facts and criteria that are relevant in VRF's case to determine whether it has violated New Mexico law.
7. The basis for the Attorney General's assertion that his actions as alleged in the First Amended Verified Complaint were not taken under the color or pretense of New Mexico law.
8. Any facts showing that New Mexico has a valid, substantial, or compelling interest in prohibiting and potentially in criminalizing VRF's conduct, and any facts showing that New Mexico's prohibition is sufficiently tailored to vindicate that interest.
9. The Attorney General's admissions and denials in his Answer.
10. The Attorney General's responses to discovery.